

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: CASE NO. 23-58209 - SMS

Kalish Jajuan Bebee,
Debtor,
CHAPTER 7

Kalish Jajuan Bebee,
Movant,

v.

CONTESTED MATTER

Nationwide Mutual Insurance Company,
Respondent.

MOTION TO AVOID JUDICIAL LIEN ON EXEMPT PROPERTY

This Motion of the Debtor respectfully represents:

1.

On August 25, 2023, Debtor filed a Voluntary Petition in Bankruptcy for relief under Title 11, Chapter 7 of the United States Code.

2.

Debtor files this Motion under 11 U.S.C. § 522(f) to avoid a judicial lien which has attached to property of the Debtor through action of law following a monetary judgment obtained by Respondent on September 25, 2019, in the State Court of Clayton County, Georgia.

3.

Said judicial lien impairs Debtor's interest in property which Debtor would ordinarily be able to exempt under 11 U.S.C. § 522 and O.C.G.A. § 44-13-100.

Wherefore, Movant prays for a judgment against Respondent for the cancellation and avoidance of the said judicial lien.

KING & KING LAW LLC

/s/

L.P. Powell, Attorney for Debtor
GA Bar #103474
215 Pryor Street
Atlanta, GA 30303
(404) 524-6400
notices@kingkingllc.com

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**NOTICE OF REQUIREMENT OF RESPONSE TO MOTION TO AVOID
JUDICIAL LIEN ON EXEMPT PROPERTY AND OF TIME TO FILE SAME**

NOTICE IS HEREBY GIVEN that, on October 31, 2023, a Motion to Avoid Judicial Lien on Exempt Property pursuant to 11 U.S.C. § 522(f) was filed in this case.

NOTICE IS FURTHER GIVEN that, pursuant to BLR 6008-1(b), Respondent must file a response to the Motion within 21 days after service, and serve a copy of said response upon Movant. If no response is timely filed and served, the Motion will be deemed unopposed and the Bankruptcy Court may enter an order granting the relief sought.

Dated: October 31, 2023

KING & KING LAW LLC

By: /s/
L.P. Powell, Attorney for Debtor
GA Bar #103474
215 Pryor Street
Atlanta, GA 30303
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on October 31, 2023, I served a copy of the Motion to Avoid Judicial Lien on Exempt Property, together with the Notice of Requirement of Response to Motion to Avoid Judicial Lien on Exempt Property and of Time to File Same upon the following by depositing a copy of same in U.S. Mail with sufficient postage affixed thereon to ensure delivery to:

Jordan E. Lubin
8325 Dunwoody Place, Building 2
Atlanta, GA 30350

Kalish Jajuan Bebee
1824 DEVON DR SW
Atlanta, GA 30311

Nationwide Mutual Insurance Company
PO box 96040
Charlotte, NC 28296

Nationwide Mutual Insurance Company
c/o Corporation Service Company, Registered Agent
2 SUN COURT, SUITE 400,
EACHTREE CORNERS, GA, 30092

KING & KING LAW LLC

By: /s/
L.P. Powell, Attorney for Debtor
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215 Pryor Street
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